

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5**

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|-----------------------------|---|--|
| <b>In the Matter of:</b>    | ) | <b>Proceeding Under Section 114(a)(1) of the</b> |
|                             | ) | <b>Clean Air Act, 42 U.S.C. § 7414(a)(1)</b>     |
| <b>Carmeuse Lime, Inc.</b>  | ) |  |
| <b>Manitowoc, Wisconsin</b> | ) |  |

**Agreed Administrative Consent Order and Information Request**

1. The Director of the Air and Radiation Division, U.S. Environmental Protection Agency (EPA), Region 5, is issuing this Agreed Administrative Consent Order (Order) and Information Request to Carmeuse Lime, Inc. (Carmeuse) under Section 114(a)(1) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a)(1).

**Statutory and Regulatory Background**

2. The CAA is designed to protect and enhance the quality of the nation's air resources so as to promote the public health and welfare and the productive capacity of its population. *See* Section 101(b)(1) of the CAA, 42 U.S.C. § 7401(b)(1).

3. Section 108(a) of the CAA, 42 U.S.C. § 7408(a), requires the Administrator of EPA to identify and prepare air quality criteria for each air pollutant, emissions of which may endanger public health or welfare, and the presence of which results from numerous or diverse mobile or stationary sources. For each such "criteria" pollutant, Section 109 of the CAA, 42 U.S.C. § 7409, requires EPA to promulgate national ambient air quality standards (NAAQS) requisite to protect the public health and welfare.

4. Section 110(a)(1) of the CAA, 42 U.S.C. § 7410(a)(1), requires each state to adopt and submit to EPA for approval a State Implementation Plan (SIP) that provides for the implementation, maintenance, and enforcement of the NAAQS. Section 110(a)(2) of the CAA, 42 U.S.C. § 7410(a)(2), requires that each SIP contain adequate provisions prohibiting any

source within the state from emitting any air pollutants in amounts which will interfere with attainment or maintenance of the NAAQS or cause significant deterioration of air quality in any other state. *See* 40 C.F.R. Part 52.

5. Upon EPA approval, SIP requirements are federally enforceable under Section 113(a)(1) of the CAA, 42 U.S.C. § 7413(a)(1).

6. On March 9, 1983, EPA approved NR 154.11 as part of the federally-enforceable Wisconsin SIP. 48 *Fed. Reg.* 9860 (March 9, 1983). NR 154.11 became federally effective on April 18, 1983. Wisconsin has since recodified NR 154.11 at NR 415.

7. The Rule at NR 154.11(1) of the federally-enforceable Wisconsin SIP [NR 415.03] states that no person shall cause, allow, or permit particulate matter (PM) to be emitted into the ambient air which substantially contributes to exceeding of an air standard, or creates air pollution.

8. The Rule at NR 154.11(2)(a) [NR 415.04] of the federally-enforceable Wisconsin SIP states that no person shall cause, allow, or permit any materials to be handled, transported, or stored without taking precautions to prevent PM from becoming airborne. Such precautions shall include, but not be limited to, application of asphalt, oil, water, suitable chemicals, or plastic covering on dirt roads, material stockpiles, and other surfaces which can create airborne dust, provided such application does not create a hydrocarbon, odor, or water pollution problem.

9. On January 18, 1995, EPA approved definitions in NR 400 as part of the federally-enforceable Wisconsin SIP. 60 *Fed. Reg.* 3538 (January 18, 1995). NR 400 became federally effective on February 17, 1995.

10. The Rule at NR 400.02(69) of the federally-enforceable Wisconsin SIP and Section 302(e) of the CAA, 42 U.S.C. § 7602(e), define “person” as, among other things, any corporation.

11. The Rule at NR 400.02(66) of the federally-enforceable Wisconsin SIP defines “particulate matter” as any airborne finely divided solid or liquid material with an aerodynamic diameter smaller than 100 micrometers.

12. The Rule at NR 400.02(10) of the federally-enforceable Wisconsin SIP defines “ambient air” as the portion of the atmosphere external to buildings and to which the general public has access.

13. The Rule at NR 400.02(5) of the federally-enforceable Wisconsin SIP defines “air pollution” as the presence in the atmosphere of one or more air contaminants in such quantities and of such duration as is or tends to be injurious to human health or welfare, animal or plant life, or property, or would unreasonably interfere with the enjoyment of life or property.

14. The Rule at NR 400.02(2) of the federally-enforceable Wisconsin SIP states that “air contaminant” is defined in NR 144.30(1), which defines it as dust, fumes, mist, liquid, smoke, other PM, vapor, gas, odorous substances, or any other combination thereof but shall not include uncombined water vapor.

15. The Administrator of EPA may require any person who owns or operates an emission source to, among other things, establish and maintain records; make reports; install, use, and maintain monitoring equipment; and submit compliance certification under Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1). The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

### **Findings**

16. Carmeuse owns and operates a limestone production facility at 4110 Rockwood Road, Manitowoc, Wisconsin 54220 (the facility).
17. Carmeuse is a “person,” as that term is defined at NR 400.02(69) of the federally-enforceable Wisconsin SIP and Section 302(e) of the CAA, 42 U.S.C. § 7602(e).
18. On June 29, 2015, the Wisconsin Department of Natural Resources (WDNR) issued Operating Permit No. 436034390-P20 to Carmeuse.
19. Carmeuse currently stores or may store bulk solid fuels (BSF) (e.g., coal and petroleum coke (petcoke)) within a quarry at the facility, which have the potential to emit “particulate matter” into the “ambient air” creating “air pollution,” as those terms are defined at NR 400.02(66), 400.02(10), and 400.02(5) of the federally-enforceable Wisconsin SIP, respectively.
20. On March 13, 2015, EPA sent a Section 114(a) Information Request to the facility which contains two sections: a document request section, to which Carmeuse responded on May 15 and 28, 2015, and a section relating to ambient air monitoring requirements. This Order completely supersedes the ambient air monitoring requirements contained in the March 13, 2015, Information Request, Appendix B, paragraphs 5-24, except as noted at paragraph 28, below.
21. On August 4, 2015, EPA and Carmeuse met to discuss the March 13, 2015, Information Request.
22. On October 23, 2015, Carmeuse submitted to EPA proposed revisions to its Fugitive Dust Plan (FDP) for the facility.

### **Compliance Program**

23. By the effective date of this Order, Carmeuse shall comply with the FDP, as described in Appendix A, at the facility.

24. Within ninety (90) days from the effective date, until termination of this Order, Carmeuse shall require all of its employees who handle BSF at the facility to complete training on each aspect of the FDP, as described in Appendix A, including proper procedures to minimize fugitive emissions. Carmeuse shall also require that its employees complete refresher training at least once a year. Carmeuse shall document completion of this training for each subject employee by date and signature.

25. As required by Paragraph 24, Carmeuse shall train any employee who may handle or manage the handling of BSF of the following measures:

- a. Regularly monitor local television weather report broadcasts, cellphone weather alerts, and internet weather updates to maintain up-to-the-minute knowledge of potential weather conditions that may influence fugitive dust emissions;
- b. Identify fugitive dust emissions from BSF handling and storage activities, especially during high-wind conditions (25 mph and above per Appendix A, Paragraph 3), and inform management of any fugitive dust emissions observed;
- c. Minimize or eliminate fugitive dust emissions by adding water to the source or potential source of emissions, immediately cleaning up spills, using sweeper vehicles, and ceasing BSF-handling activities when necessary;

For the Front End Loader Operator and/or the Haul Truck Operator specifically:

- d. Maintain the BSF piles in the quarry daily by combining stray BSF into the main pile(s) and ensuring that no BSF pile exceeds a height of 30 feet;
- e. Load blended BSF from the Front End Loader Bucket into the Haul Truck so that the drop distance from the Loader Bucket to the Haul Truck is at the minimum achievable;

- f. Load blended BSF from the Front End Loader Bucket or Haul Truck into the Below Grade Solid Fuel Hopper so that the drop distance from the Loader Bucket or Haul Truck into the Below Grade Solid Fuel Hopper is at the minimum achievable;
- g. Ensure the Front End Loader Bucket or Haul Truck is loaded to prevent the BSF from escaping from the vehicle transporting it; and
- h. Not exceed the posted speed limit of 10 miles per hour at the facility.

26. Carmeuse shall report to EPA, on a quarterly basis, the progress of its efforts to train all employees under Paragraph 24 and 25 in a quarterly report submitted pursuant to Paragraph 37.

27. During the term of this Order, Carmeuse must at all times ensure that at least three employees at the facility are certified under EPA Method 9 such that these employees can read the opacity of fugitive emissions from BSF handling and storage activities.

28. Carmeuse shall report on its activities under Paragraph 27 each quarter in a quarterly report submitted pursuant to Paragraph 37.

29. For 6 months commencing on August 1, 2017, Carmeuse shall measure wind conditions within the quarry and compare it to wind conditions measured on the surface and predicted wind conditions provided by readily-available weather services.

30. By no later than 30 days after completion of the study described in Paragraph 29, above, Carmeuse shall evaluate the collected data and develop a Wind Monitoring Plan to be incorporated into its FDP.

31. Within 30 days of completion of the wind monitoring plan, Carmeuse shall submit the Wind Monitoring Plan to EPA for review and approval, along with the data used to create the Wind Monitoring Plan pursuant to Paragraph 37.

32. Within 30 days of EPA approval of the Wind Monitoring Plan, Carmeuse shall implement the Wind Monitoring Plan and incorporate the Wind Monitoring Plan into the FDP.

33. [Intentionally Omitted].

34. By no later than ninety (90) days after the approval of the WMP by EPA, Carmeuse shall submit a construction permit or a CAA Title V modification to WDNR requesting the incorporation of the FDP identified in Paragraph 32 above into its Operating Permit. If Carmeuse fails to timely submit the construction permit or the Title V permit modification to the WDNR, then it shall install at least one continuous Federal Equivalent Method (FEM) real-time particulate matter (PM<sub>10</sub>) monitor and at least one Federal Reference Method (FRM) PM<sub>10</sub> filter-based monitor operating every third day, as detailed in Appendix B.

35. Carmeuse shall submit to EPA all correspondence with WDNR with regard to the permit modification required by Paragraph 34, above, upon submission or receipt.

36. Once WDNR incorporates the FDP into Carmeuse's Operating Permit, the requirements of Paragraphs 23-35 and 37 shall no longer apply.

37. Carmeuse must send all reports and correspondence required by this Order to [smith.molly@epa.gov](mailto:smith.molly@epa.gov), [cantello.nicole@epa.gov](mailto:cantello.nicole@epa.gov), [R5airenforcement@epa.gov](mailto:R5airenforcement@epa.gov), and:

Attention: Compliance Tracker (AE-18J)  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

### **General Provisions**

38. Carmeuse agrees to the terms of this Order and further agrees that it will not contest the basis or validity of this Order. Carmeuse waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that it may have with

respect to any issue of fact or law set forth in this Order, including any right of judicial review of this Order under 42 U.S.C. § 7607(b)(1) or 5 U.S.C. §§ 701-706.

39. This Order does not affect Carmeuse's responsibility to comply with other federal, state, and local laws.

40. This Order does not restrict EPA's authority to enforce Section 110 of the CAA, 42 U.S.C. § 7410, or any other section of the CAA.

41. Failure to comply with this Order may subject Carmeuse to penalties of up to \$37,500 per day for each violation under Section 113 of the CAA, 42 U.S.C. § 7413, and 40 C.F.R. Part 19.

42. The terms of this Order are binding on Carmeuse, its assignees, and successors. Carmeuse must give notice of this Order to any successors in interest prior to transferring ownership and must simultaneously verify to EPA, at the above address, that it has given the notice.

43. Carmeuse may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B, for any portion of the information it submits to EPA. Information subject to a business confidentiality claim is available to the public only to the extent allowed by 40 C.F.R. Part 2, Subpart B. If Carmeuse fails to assert a business confidentiality claim, EPA may make all submitted information available, without further notice, to any member of the public who requests it. Emission data provided under Section 114 of the CAA, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. "Emission data" is defined at 40 C.F.R. § 2.301.

44. This Order is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information by an agency from specific individuals or entities

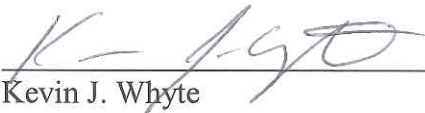


as part of an administrative action or investigation. Please submit the reports required by this Order without staples; paper clips and binder clips, however, are acceptable.


45. EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.

46. This Order is effective on the date of signature by the Director of the Air and Radiation Division. This Order will terminate one year from the effective date, provided that Carmeuse has complied with all terms of the Order throughout its duration.

7/10/2017  
Date

  
Kevin J. Whyte  
General Counsel  
Carmeuse Lime and Stone

7/24/17  
Date

  
Edward Nam  
Director  
Air and Radiation Division  
U.S. Environmental Protection Agency, Region 5

## **Appendix A**

### **Fugitive Dust Plan**

#### **Best Management Practices to Reduce Visible Emissions and Fugitive Dust at Carmeuse Lime and Stone's Manitowoc, Wisconsin facility**

1. All Carmeuse employees, particularly those who handle and store bulk solid materials (BSF) are responsible for complying with the requirements herein.
2. Carmeuse shall store all BSF along the north wall of the quarry located at the facility to minimize wind exposure.
3. Carmeuse shall continuously observe BSF-handling and storage activities for the presence of fugitive dust during high wind events (generally sustained winds greater than 25 miles per hour).
4. If Carmeuse observes fugitive dust emissions from BSF-handling or storage activities, it shall implement method(s) to mitigate the fugitive emissions (e.g., adding water to the source of emissions) and shall conduct follow-up observations to verify their effectiveness.
5. If there is a high potential for fugitive dust emissions from BSF at the facility from high wind conditions, drought, or heavy activity, Carmeuse shall apply water to the BSF. In the event that temperatures are at or below freezing or water use is restricted due to drought, Carmeuse shall apply a Freeze Conditioning Agent to the BSF.
6. Carmeuse shall accept BSF delivered to the facility only in covered semi dump trailers.
7. Carmeuse shall maintain the BSF piles in the quarry daily with a Front End Loader by combining stray BSF into the main pile(s) and ensuring that no BSF pile exceeds a height of 30 feet.
8. The Front End Loader Operator shall visually inspect the BSF piles daily for the presence of fugitive dust using EPA Reference Method 22, during business hours, in the course of routine operations and shall notify management of any fugitive dust emissions from the BSF piles. The Front End Loader Operator shall record the sources observed, whether any fugitive dust emissions were noticed, and the actions taken to minimize/eliminate the emissions.
9. If the Front End Loader Operator observes fugitive dust emissions from the BSF piles, Carmeuse shall conduct and record visual emission readings using EPA Reference Method 9 and shall take the appropriate action to minimize/eliminate the emissions.

10. In addition to any Method 9 readings conducted as per paragraph 9, above, once every 2 months, Carmeuse shall conduct three Method 9 tests of the BSF piles, for a total of 18 minutes of observation, and shall record the results.
11. Carmeuse shall notify the Wisconsin Department of Natural Resources in semi-annual reports of any visual emission readings conducted using Method 9 where the 6-minute average exceeds 5 percent opacity.
12. Carmeuse shall conduct all blending of coke and petroleum coke (petcoke) in the quarry.
13. Carmeuse shall store all blended BSF in a tent in the quarry.
14. Carmeuse shall use the Front End Loader or Haul Truck to transport blended BSF to the Kilns.
15. Carmeuse shall load the Front End Loader or Haul Truck in such a way to prevent the BSF from dropping, leaking, blowing, or otherwise escaping from the vehicle transporting it.
16. When loading blended BSF from the Front End Loader Bucket into the Haul Truck, Carmeuse shall do so at the minimum achievable drop distance from the Loader Bucket to the Haul Truck.
17. When loading blended BSF from the Front End Loader Bucket or Haul Truck into the Below Grade Solid Fuel Hopper, Carmeuse shall do so at the minimum achievable drop distance from the Loader Bucket or Haul Truck into the Below Grade Solid Fuel Hopper.
18. Carmeuse shall ensure that all enclosed systems conveying BSF is properly maintained to prevent the BSF from dropping, leaking, blowing, or otherwise escaping.
19. Carmeuse shall adhere to the posted facility speed limit of 10 miles per hour when using the Front End Loader or Haul Truck.
20. For paved and unpaved roads at the facility on which BSF is handled, Carmeuse management shall visually inspect, at least once a month, for the presence of fugitive dust using Method 22 and shall record the source observed, whether any fugitive dust emissions were noticed, and any corrective actions taken to minimize/eliminate emissions and correct any other problem:

## Appendix B

If Carmeuse Lime, Inc. (Carmeuse) elects not to comply with the FDP, as described in Appendix A, at its facility located at 4110 Rockwood Road, Manitowoc, Wisconsin (the facility), then it shall notify EPA in writing to the address listed in paragraph 19, below, and shall comply with the following:

### **PM<sub>10</sub> Monitors and Siting**

1. No later than 30 days prior to acceptance of any petcoke at the facility, Carmeuse shall submit proposed monitoring site locations at the facility for EPA review and approval prior to establishing the monitoring sites. Carmeuse shall also submit to EPA a map showing the property lines of the facility, the locations of nearby residences and industrial properties, and proposed locations of the monitoring sites;
2. Within 30 days of EPA approval of the monitoring site locations specified in paragraph 1, above, Carmeuse shall install, operate, and maintain at least one ambient monitoring site at the facility that shall contain at least one continuous Federal Equivalent Method (FEM) real-time particulate matter (PM<sub>10</sub>) monitor and at least one Federal Reference Method (FRM) PM<sub>10</sub> filter-based monitor operating every third day;
3. The monitoring sites and monitoring equipment shall conform with the following requirements:
  - a. The PM<sub>10</sub> real-time and filter-based instruments shall meet the specifications of FRM/FEM monitors on this list:  
[www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf](http://www.epa.gov/ttn/amtic/files/ambient/criteria/reference-equivalent-methods-list.pdf);
  - b. Carmeuse shall follow all monitoring, siting, and quality assurance criteria in 40 CFR Part 58, Appendix E;
  - c. PM<sub>10</sub> concentrations from filter-based sampling shall be determined according to 40 CFR 50, Appendix J to Part 50 – “Reference Method for the Determination of Particulate Matter as PM<sub>10</sub> in the Atmosphere;”
  - d. All data collected shall be consistent with units in the National Ambient Air Quality Standards for PM<sub>10</sub>; and
  - e. A data logger shall be attached to the monitors to record readings from the continuous monitors.
4. Carmeuse shall also follow the operating procedures identified in the “Quality Assurance Handbook for Air Pollution Measurement Systems” (located at <http://www.epa.gov/ttn/amtic/qabook.html>), 40 CFR Part 58, Appendix A, and any specified procedures in the manufacturer’s maintenance manual for the units used to monitor PM<sub>10</sub>;
5. Carmeuse shall be responsible for all operation and maintenance associated with the PM<sub>10</sub> monitors. Maintenance shall include, at a minimum, the replacement of any

equipment and cleaning on a schedule specified in the manufacturer's maintenance manual;

6. Carmeuse shall order and pay for any necessary replacement parts, accessories, maintenance, etc;
7. Carmeuse shall properly change the PM<sub>10</sub> filters in all sampling devices;
8. Carmeuse shall archive all filters from the PM<sub>10</sub> filter-based instruments for at least 2 years;
9. Carmeuse may apply to EPA to terminate the requirements of this Request, however, at least one year of information must be collected under this Request before such an application is made;

### **Wind Speed and Direction Monitoring**

10. Carmeuse shall install a meteorological tower at a location representative of local wind conditions. At a minimum, the meteorological tower must continuously measure and record wind speed and wind direction at one-hour intervals throughout the entire ambient monitoring period. Carmeuse shall correlate 1-hr and 24-hr ambient PM<sub>10</sub> measurements with wind speed and wind direction data to determine source direction and the effects of wind speed on PM<sub>10</sub> concentrations. The meteorological tower must also include calibrated ambient temperature and pressure instrumentation for purposes of determining corrected (actual) PM<sub>10</sub> concentrations as recorded by the monitors. Carmeuse shall maintain and/or submit reports and records in accordance with the paragraphs 11-19, below;
11. With respect to the meteorological monitoring site, Carmeuse shall follow the Quality Assurance Handbook for Air Pollution Measurement Systems Volume IV: Meteorological Measurements Version 2.0 (Final) found at:  
[http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV\\_Meteorological\\_Measurements.pdf](http://www.epa.gov/ttnamti1/files/ambient/met/Volume%20IV_Meteorological_Measurements.pdf);
12. The internal clocks of all PM<sub>10</sub> analyzers, data loggers, and the wind speed and wind direction data logger shall be synchronized to within 60 seconds of each other (local time and not adjusted for Daylight Savings Time) and shall be checked against a calibrated reference clock at least once every 30 days. Instrument clocks that are more or less than 60 seconds from the reference clock shall be reset to within 60 seconds of the reference clock. Each of these inconsistencies and each reset time shall be noted in the study log;
13. Continuous PM<sub>10</sub> data collected during wind speeds of less than 0.5 meters per second shall be segregated from other wind data for purposes of wind speed and wind direction correlations;

14. Carmeuse shall be responsible for maintenance associated with the meteorological tower on a schedule specified in the manufacturer's maintenance manual. Carmeuse shall order and pay for any necessary replacement parts, accessories, maintenance, etc.

**General Requirements Applicable to All Requests**

15. Within 30 days of EPA approval of the monitoring sites, Carmeuse shall submit a Quality Assurance Project Plan (QAPP) to EPA. The guidance document for writing a QAPP is "EPA Guidance for Quality Assurance Project Plans," EPA QA/G-5, EPA/600/R-02/009 - December 2002. The guidance is available at <http://www.epa.gov/QUALITY/qs-docs/g5-final.pdf>. Any measures identified by this information request should be incorporated into the QAPP;
16. Carmeuse shall provide EPA and/or the Wisconsin Department of Natural Resources access to the monitoring sites and respond to any inquiries regarding monitor siting, operations, or maintenance. In the event that an inspector or auditor identifies problems, Carmeuse shall take appropriate corrective actions. Any changes made to monitor siting, operations, or maintenance shall be approved by EPA prior to the change;
17. Carmeuse shall keep a daily log and monthly reports of the following information:
  - a. Each site visit and operator activities;
  - b. Any monitoring system downtime (date, time, duration, and reason) along with any corrective actions taken;
  - c. Any possible interferences observed by the operator such as nearby construction or demolition; and
  - d. Any calibration data provided by the manufacturer or performed by Carmeuse.
18. Hourly data from each monitor and meteorological monitoring site, and 24-hour data from gravimetric monitors shall be downloaded as ASCII comma-delimited files and provided to EPA on CD and by email every month. The files should have a single "header" row, with all following rows being individual records, and all columns being a single variable according to the header row. All filter analysis data, including any specification data shall also be provided;

19. Monthly reports specified in paragraph 18, above, shall be submitted to EPA for a period of one year. Each report is due within 14 days of the end of the month being reported. At the end of the one year time frame, Carmeuse may seek termination or modification of this request. Carmeuse shall submit all documents due under this request and the monthly reports to [smith.molly@epa.gov](mailto:smith.molly@epa.gov), [cantello.nicole@epa.gov](mailto:cantello.nicole@epa.gov), [r5airenforcement@epa.gov](mailto:r5airenforcement@epa.gov), and:

Attn: Compliance Tracker, AE-18J  
Air Enforcement and Compliance Assurance Branch  
U.S. Environmental Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**CERTIFICATE OF MAILING**

I, Kathy Jones, certify that I sent the Agreed Administrative Consent Order and Information Request, by certified mail, return receipt requested, to:

Michael Simmons  
Site Operations Manager  
Carmeuse Lime, Inc.  
4110 Rockwood Road  
Manitowoc, Wisconsin 54220

Carie Boldt  
Quality Supervisor  
Carmeuse Lime, Inc.  
4110 Rockwood Road  
Manitowoc, Wisconsin 54220  
*Certified Mail # 7016 1370 0001 5719 9247*

I also certify that I sent a copy of the Agreed Request, by first-class mail to:

Imelda Hofmeister  
Wisconsin Department of Natural Resources  
625 East County Road Y, Suite 700  
Oshkosh, Wisconsin 54901

Maria Hill  
Acting Chief  
Compliance, Enforcement, and Emission Inventory Section  
Bureau of Air Management  
Wisconsin Department of Natural Resources  
101 South Webster Street  
P.O. Box 7921 (AM/7)  
Madison, Wisconsin 53707-7921

on the 25<sup>th</sup> day of July, 2017.

*[Signature]*  
Kathy Jones  
Program Technician  
AECAB/PAS

CERTIFIED MAIL RECEIPT NUMBER: 7016 1370 0001 5719 9339